

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

West Broadway, Suite 425
Beach, CA 90802-4444
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M60050_004251
MCAS EL TORO
SSIC NO. 5090.3.A



May 10, 1996

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

COMMENTS ON DRAFT QUARTERLY GROUNDWATER MONITORING REPORT AND DRAFT
GROUNDWATER DATA TRENDS AND RECOMMENDATIONS REPORT, MARINE CORPS AIR
STATION (MCAS) EL TORO

The California Environmental Protection Agency (Cal/EPA) has completed the review of the above subject reports both dated April 18, 1996, prepared by CDM Federal Programs Corporation. The reports present the results of the January-February 1996 groundwater sampling round from a network of 163 monitoring wells/monitoring ports conducted at MCAS El Toro. Also, the reports propose a modified plan for the sampling frequency and analysis program. During the sampling round, groundwater samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds, pesticides, herbicides, general chemistry, metals (filtered and unfiltered samples), treatability parameters, and other site-specific analytes.

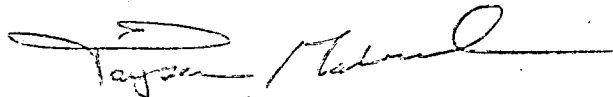
The Department of Toxic Substances Control and the Regional Water Quality Control Board comments were transmitted the Navy on May 2, 1996. Since then, we received the enclosed, May 8, 1996, comments from Orange County Water District. Please incorporate the agreed upon changes, where appropriate, and send us a response to comments along with a revised document.



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Thank you for your cooperation. If you have any questions, please call me at (310) 590-4891.

Sincerely,



Tayseer Mahmoud
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

Enclosure

cc: Ms. Bonnie Arthur
U. S. Environmental Protection Agency
Region IX
Hazardous Waste Management Division, H-9-2
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Lawrence Vitale
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Roy Herndon
Orange County Water District
10500 Ellis Avenue
P.O. Box 8300
Fountain Valley, California 92728-8300

Lt. Hope Katcharian
Director, Environmental Engineering Division, (1AU)
Marine Corps Air Station-El Toro
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cc: Ms. Sherrill Beard
Engineering Geologist
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

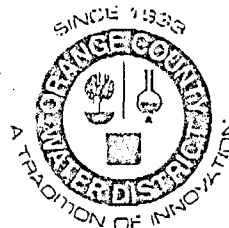
Mr. Andy Piszkin
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ORANGE COUNTY WATER DISTRICT

May 8, 1996

Mr. Patrick J. Russell
CDM Federal Programs Corporation
3760 Convoy Street, Suite 210
San Diego, CA 92111

SUBJECT: Comments on Draft Quarterly Groundwater Monitoring Report for
MCAS El Toro

Dear Mr. Russell:

Summarized herein are my comments to the aforementioned report, as we discussed on the phone on May 6, 1996.

1. P. 1-4, second bullet item: reference to wells should be revised to say, "Wells constructed by Orange County Water District (OCWD) and paid for by the Navy."
2. P. 2-1 and throughout report, tables, and maps: OCWD well 18_MCAS-05 was destroyed in 1994 and was replaced with a new well 18_MCAS-05A in close proximity to the old well. The screened interval of the new well is 120 to 130 feet bgs.
3. P. 2-1: The reference to inaccessibility to well 18_MCAS-09 due to rain probably refers to well 18_MCAS-08, since 18_MCAS-09 is along a sidewalk on a paved street, whereas 18_MCAS-08 is in a dirt lot. This reference should be checked and corrected as appropriate.
4. P. 2-3: Packer problems should be clarified for nested monitoring wells, not for Westbay-type multipoint monitoring wells.
5. Table 4-1: VOC data errors were noted for certain dates for OCWD "MCAS" wells for the period of February through December 1993. Errors are notable for their "non-detect" TCE concentrations among histories of consistent detections. It appears that two specific sampling dates for wells MCAS-01 (most zones with TCE), MCAS-02 (zones with TCE), MCAS-03 (zones 1 and 2), MCAS-07 (zones with TCE), and MCAS-09 have the errors, one sampling event by OCWD and one by CH2M Hill. I noted the same error in the Navy's draft OU-1 RI report in July 1994. A printout of

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OCWD's historical VOC data for the MCAS wells will be forwarded to you in the next week that will contain all OCWD data, but not the Navy data.

6. Regarding the air entrainment issue in the monitoring wells, I believe a strong possibility exists that the air noted in the sample bottles was due to off-gassing from depressurization of groundwater with a high dissolved gas (CO_2 , methane, or air) concentration. OCWD has observed and verified "milky" or cloudy water (very small air bubbles) due to off-gassing of groundwater brought to atmospheric pressure in the Tustin, Orange, Anaheim, and Huntington Beach areas. Headspace analysis of the water indicates the gas to be either dissolved air or methane. Such an analysis of the off-gas should be made before drawing conclusions as to the cause/source of the air bubbles in the water samples.
7. Regarding destroyed Navy wells 18_RW3 and 18_RW4, I am requesting a copy of the abandonment records for these wells for our files to document that they were properly sealed. Please forward this request to Andy Piszkin (SWDIV) if CDM Federal is not the appropriate party to address it.

Please contact me at (714) 378-3260 if you have any questions.

Sincerely,



Roy L. Herndon
Manager, Hydrogeology Department

cc: Tayseer Mahmoud, Cal/EPA DTSC
Larry Vitale, Santa Ana RWQCB
Bonnie Arthur, USEPA Region IX